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7 Attorney for Kejon Ward

8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 v.

13 KEJON WARD,

14 Defendant.
15

Case No. 2:17-cr-00221-JAD-GWF-2

EMERGENCY MOTION TO
MODIFY CONDITIONS OF
RELEASE ALLOWING MR. WARD
TO TRAVEL TO CALIFORNIA

16 The Defendant, Kejon Ward, through his attorney, Rene L. Valladares, Federal Public
17 Defender, and Rebecca Levy, Assistant Federal Public Defender, respectfully moves this
18 Honorable Court to respectfully to modify condition of his release to allow Mr. Ward to travel
19 to California to visit with his dying father. Mr. Ward's release allows him to travel to California
20 without modifying his release, but he needs permission from this Court to stay somewhere aside
21 from his current residence.

22 DATED: January 20, 2022.

23 RENE L. VALLADARES
Federal Public Defender

24
25 By: /s/ Rebecca Levy

26 REBECCA LEVY
Assistant Federal Public Defender
Attorney for Kejon Ward

ARGUMENT

On July 20, 2017, Mr. Ward made his initial appearance for violations of 18 U.S.C. § 924(c)(1)(A)(ii), 18 U.S.C. § 1951(a), and 18 U.S.C. § 922(g). ECF No. 21. At the initial appearance on July 20, 2017, Mr. Ward submitted to detention, but reserved the right to re-open the hearing once the state hold lifted. ECF No. 39. During the initial appearance, Mr. Ward was being held on a state hold. On September 7, 2017, Mr. Ward's state hold was discharged. On November 2, 2017, Mr. Ward was released with several conditions including home confinement with GPS monitoring. ECF No. 69. On November 8, 2017, the government's request to revoke Mr. Ward's release was denied. ECF No. 73. On November 11, 2018, the Court modified Mr. Ward's release conditions allowing him to spend time with his son on Sundays. ECF No. 141. On August 26, 2021, Mr. Ward plead guilty pursuant to a plea agreement and accepted responsibility. ECF No. 284. Sentencing is currently scheduled for February 15, 2022. ECF No. 303.

Mr. Ward is working full-time, but found even better steady employment with Show Group Production Services. Sadly, Mr. Ward's father has terminal cancer that has spread. Mr. Ward would like to visit with his father, and this requires the Court to allow him to stay with his relatives in California. Mr. Ward will stay at his grandmother's house in Bakersfield, Pretrial Services has been provided the address. If approved, Mr. Ward would be gone from as soon as the Court grants this Motion or this Friday, January 21, 2022, if the Court grants this Motion before that time until Sunday January 23, 2022. Mr. Ward will go to California with his sister who will drive them in their mother's car. Mr. Ward requests that the Court allow him to be relieved of home detention during the two days he is in California to allow him to visit his father who is receiving end-of-life medical care at Kern Medical Hospital in Bakersfield, California.

Pretrial does not object to this request.

CONCLUSION

Accordingly, we are respectfully requesting this Court modify the conditions of Mr. Ward's release to allow him to travel to California and stay with his relatives while visiting with his dying father and to be relieved of home detention until Monday, January 24, 2022.

DATED: January 20, 2022.

Respectfully submitted,
RENE L. VALLADARES
Federal Public Defender

By: /s/ Rebecca Levy

REBECCA LEVY
Assistant Federal Public Defender
Attorney for Kejon Ward

IT IS SO ORDERED.


U.S. MAGISTRATE JUDGE

Dated: January 20, 2022